



FEMA Requirement A1: Documenting the Planning Process

Does the Plan document the planning process, including how it was prepared and who was involved in the process for each jurisdiction?

Local Mitigation Plan Review Guide, FEMA, 2011, page 15

This “Good Practice” document is intended to help plan developers understand the FEMA requirement to document the preparation of the current local hazard mitigation plan.

Common Reasons Why FEMA Returns Plans for A1 Revisions

1. The schedule to develop the plan is not adequately explained with an identified beginning and subsequent timeline of activities.
2. The process and activities involved in the current plan’s development are not documented or described, such as the steps and accomplishments at each phase. In some cases, plan updates only describe and document a previous planning cycle without addressing the current plan’s development.

Tip: Many communities describe the process in a designated plan section.

Tip: For updates, describe whether and how activities differed from those leading to the prior plan. For instance, these could be changes to committee organization or how the risk assessment was conducted. Explain why these adjustments were made and if the change was beneficial or not.

Tip: Append meeting agendas, public notices, summaries/minutes, news articles, and other materials as further documentation of plan development. These may have the added benefit of serving as useful models in a future plan update.

3. The individuals involved in the current plan’s development are not documented or otherwise identified.

Tip: If a plan development committee was established, then identify these individuals, their positions and roles within the committee, their representation of municipalities, agencies or groups, and their positions or

roles outside the committee, if any.

Tip: Include meeting sign-in sheets, agendas, and meeting minutes, which show the participation of individuals representing the involved jurisdiction(s).

4. One or more municipalities appear to have adopted a single or multiple jurisdiction plan without being actively involved in its creation. A plan does not document how each jurisdiction participated throughout a current plan's development, whether through planning committee meetings, meetings within each community, phone or email consultations, etc. A poorly described or an incorrectly managed process could indicate a contractor, regional planning agency, or other party wrote the mitigation plan without the jurisdiction's direct involvement.

Tip: For multi-jurisdictional updates, record if new municipalities joined, or whether communities in the former plan declined to participate.

5. The plan is not identified as a new plan or an update of a previous FEMA-approved plan.

Tip: Disclose in single-jurisdiction plan when it is succeeding a prior FEMA-approved multi-jurisdiction plan, or the reverse case of multiple to single jurisdiction.

Plan Demonstrating Good Practice for Requirement A1

This section provides an example of how communities explain and record the development of their plan. While this abstract describes a multi-jurisdictional process, the concepts apply to single jurisdiction plans as well. It is preceded by a brief explanation why this example meets the requirement. In addition, practices going "Beyond Minimum Requirements" are noted. Many other approaches are possible, so don't be limited by these examples; the approach taken should fit the particular circumstances of the community.

Example: *Abstract from a Multi-Jurisdictional Plan*

Why This Plan Demonstrates Good Practice

1. A series of activities within the current planning process are described and dated, including the beginning and conclusion.
2. Meetings are well documented both in the plan body and in the appendix.
3. The currently participating municipalities are identified.

Beyond Minimum Requirements: Multiple jurisdictions participated in both the former and current plan, and the specific towns involved in each are

acknowledged.

4. Municipal representatives on the hazard mitigation planning committee are identified by position and affiliation along with other participants. The role of each town's representatives is explained.
5. The 2015 plan is identified as an update of a prior-approved 2010 hazard mitigation plan.

See Abstract on following pages.

Abstract from a Multi-jurisdiction Plan

The Planning Process

The three towns of Teaburg, Webster, and Fryville developed this 2015 multi-jurisdictional plan and were also participants in the previous FEMA-approved 2010 plan for five Warsaw County towns. Two other municipalities within the 2010 plan (Maytown and Seton) are opting to work separately on single jurisdiction plans, and did not participate in this 2015 plan.

Multi-Town Planning Committee

Each town Board of Selectmen first chose two individuals during their January 2014 meetings to represent the community on a Multi-Town Planning Committee. Meetings of this Committee were then held April 4, 2014, November 2, 2014 and April 10, 2015 at the Regional Planning Dwight Building. These collaborative public meetings sought input from the general public through public notices in the daily newspaper and bulletin board postings. Regional Planning staff members, Planner Denise Falls and Brian Jones, facilitated and moderated the meetings and subsequent assistance to the individual towns.

Town	Teaburg	Webster	Fryville
Representatives	Robert White, EMD Todd Black, Selectmen	Mark Webber, Town Manager Donna Blake, Assessor	Steve Wolters, Fire Chief Glenda Ward, EMT

Municipal Meetings

These town-appointed representatives managed the hazard mitigation planning process at the municipal level. Each acted as liaison to their town select board and organized publicly posted meetings with highway/public works supervisors, police chiefs, emergency management personnel, conservation commissioners, building inspectors, community organizations and the public. (See meeting list next page.)

Two to three working public meetings were held in each community during 2014 and 2015 to collect comments from local officials, community organizations, local businesses, and the public. Appendix A contains attendance records, agendas, and minutes for each meeting along with public notices, municipal website postings, and newspaper coverage.

In each town, two regularly scheduled Selectmen's meetings reviewed plan progress in each participating community. An additional select board meeting in each town was attended by the regional planning staff in order to review the plan before submission. The regional planning agency coordinated forwarding the plan to the state and FEMA.

Continued next page...

Abstract from a Multi-jurisdiction Plan*Continued:*

Following receipt of the FEMA Approval Pending Adoption (APA) letter, the last municipal meeting was to adopt and send the plan to FEMA with each town's adoption resolution, in order to receive official approval. FEMA approval of the plan was received on August 12, 2015.

Town of Teaburg Public Meetings

January 4, 2014 – Board of Selectmen, selection of representatives

April 20, 2014 – Working public meeting

September 30, 2014 – Working public meeting

November 30, 2015 – Board of Selectmen, review of plan progress

Feb 17, 2015 – Board of Selectmen, review of plan progress

March 2, 2015 – Working public meeting

April 20, 2015 – Board of Selectmen, forwarding plan for APA

July 15, 2015 – Board of Selectmen, adoption of plan, forward to FEMA.

Town of Webster Public Meetings

January 6, 2014 – Board of Selectmen, selection of representatives

April 22, 2014 – Working public meeting

November 29, 2015 – Board of Selectmen, review of plan progress

Feb 18, 2015 – Working public meeting

March 3, 2015 – Board of Selectmen, review of plan progress

April 21, 2015 – Board of Selectmen, forwarding plan for APA

July 17, 2015 – Board of Selectmen, adoption of plan, forward to FEMA.

Town of Fryville Public Meetings

January 5, 2014 – Board of Selectmen, selection of representatives

April 23, 2014 – Working public meeting

November 28, 2015 – Board of Selectmen, review of plan progress

Feb 19, 2015 – Working public meeting

March 6, 2015 – Board of Selectmen, review of plan progress

April 19, 2015 – Board of Selectmen, forwarding plan for APA

July 20, 2015 – Board of Selectmen, adoption of plan, forward to FEMA.

Planning Steps

The update for the 2015 hazard mitigation plan was the result of a seven step process. The initial action was to establish the Multi-Town Planning Committee through the January 2014 selection of town representatives.

Continued next page...

Abstract from a Multi-jurisdiction Plan*Continued:*

Step two started the plan update process and included the first meeting of the Committee on April 4, 2014 which focused on discussing vulnerabilities of high concern to each community, re-ranking hazards, and discussing the process for updating the plan. The resulting process is summarized below for convenience and detailed procedural methodologies are presented within the plan's respective chapters. (See Chapter 5 for a more detailed description of both the planning and the public participation process by which the 2015 update was completed.)

Step three began with a working meeting within each town to review the hazards and vulnerabilities identified in the 2010 plan documenting their historical occurrences and reassessing the likelihood of future events as set forth in the plan. Individuals attending these meetings then prepared draft plan sections based on information from this meeting and follow-up research submitted by other attendees.

Step four involved assessment of risk by each town starting with a review of those identified by the 2010 plan. Regional planning staff assisted. This process occurred during the February 2015 working meetings as each town also reviewed and updated additional local information. New data was incorporated on detailed facility inventories, mapped local concerns, generated fiscal and population impact analyses, determined the level of risk and produced a draft risk assessment matrix. The summary of high concern vulnerabilities/problem statements was updated.

Step five began on November 2, 2014. The Multi-Town Planning Committee reviewed and adjusted the mission statement, specific mitigation goals, and optional mitigation actions for each problem statement based on input received during the town working meetings, from Selectmen, and the public.

Step six in February 2015 focused on the prioritization by each town of its preferred mitigation actions and the development of an implementation, evaluation and revision schedule. Several individual town departments attended and advised during each towns' working meeting.

Step seven in February or March 2015 furthered review process with a presentation by regional planning staff to each Board of Selectmen and those attending in order to gather comments. The draft plan was emailed to Emergency Management Directors in the neighboring towns of Bakersfield, Maytown and Seton for their review and comments. The deadline for receiving all comments was March 25, 2015. Under the direction of the Multi-town Planning Committee, the regional planning staff made plan edits based on collected remarks (see Chapter 5). The amended plan was presented to each Board of Selectmen for review in April 2015, and subsequently was submitted to the State and FEMA as described previously.

A1 Regulatory Guidance

Abstracts from *Code of Federal Regulations and Local Mitigation Plan Review Guide, October 1, 2011*

Element A1 Regulation [§201.6(c)(1)] (page 14)

[The plan shall document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.

Element Intent (page 15)

To inform the public and other readers about the overall approach to the plan's development and serve as a permanent record of how decisions were made and who was involved. This record also is useful for the next plan update.

Element Requirements (page 15)

- a. Documentation of how the plan was prepared **must** include the schedule or timeframe and activities that made up the plan's development as well as who was involved. Documentation typically is met with a narrative description, but may also include, for example, other documentation such as copies of meeting minutes, sign-in sheets, or newspaper articles.

Document means provide the factual evidence for how the jurisdictions developed the plan.

- b. The plan **must** list the jurisdiction(s) participating in the plan that seek approval.
- c. The plan **must** identify who represented each jurisdiction. The Plan **must** provide, at a minimum, the jurisdiction represented and the person's position or title and agency within the jurisdiction.
- d. For each jurisdiction seeking plan approval, the plan **must** document how they were involved in the planning process. For example, the plan may document meetings attended, data provided, or stakeholder and public involvement activities offered. Jurisdictions that adopt the plan without documenting how they participated in the planning process will not be approved.

Involved in the process means engaged as participants and given the chance to provide input to affect the plan's content. This is more than simply being invited (See "**opportunity to be involved in the planning process**" in A2 below) or only adopting the plan.

- e. Plan updates **must** include documentation of the current planning process undertaken to update the plan.

Check Out These Additional Aids

Local Mitigation Plan Review Guide, October 2011

<http://www.fema.gov/media-library/assets/documents/23194>

Local Mitigation Planning Handbook, March 2013 (page 2-6)

<http://www.fema.gov/media-library/assets/documents/31598>